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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS MEHRA TO NATIONAL NEWSPAPER ASSOCIATION INTERROGATORY REDIRECTED FROM WITNESS NERI (NNA/USPS-T4—5(c))

(March 14, 2012)

The United States Postal Service hereby files responses to the abovelisted interrogatory of the National Newspaper Association dated February 22, 2012. The interrogatory has been redirected from witness Neri to witness Mehra for response. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno Chief Counsel, Global Business & Service Development

Caroline R. Brownlie Attorneys

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-3010; Fax -5287 March 14, 2012

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NNA/USPS-T4—5(c)

c. Will the hub facilities house a Business Mail Entry Unit? If your response is no, please describe how a local mailer with mail destined within the former "turnaround" zone will be expected to enter mail.

RESPONSE:

c. See the response to subpart (d) from Witness Neri indicating that the presence of a hub will depend on geographic coverage and logistical network requirements. The Postal Service will determine whether hub facilities will house BMEUs once it determines the location of the hub facilities.